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DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, WALLA WALLA DISTRICT
201 NORTH 3RD AVENUE
WALLA WALLA, WA 99362-1876

February 13, 2023

U.S. EPA Region 10
Attn: ICIS Data Team
1200 Sixth Avenue, Suite 155
Spokane, Washington 98101-3188

Dear Sir or Ma'am:

This letter is in reference to a non-compliance incident relating to NPDES permit # WA0026786 for Little Goose Lock and Dam located in Columbia County on the Snake River at River Mile 70.

1. Description of noncompliance issue and it's cause:

The results of hydrocarbon testing taken on 5 January 2023 from Little Goose HVAC Heat Pump outfall #003 shows the presence of oil or grease. The sample returned 9.6 mg/L hydrocarbon and the permit allowance is 5.0 mg/L. The HVAC Heat Pumps include heat exchangers for refrigerant (which contains lubricating oil). The exact source of the oil or grease has yet to be determined. There are two pumps that run intermittently, and it appears that Heat Pump 1 was running during this sampling period.

2. Period of noncompliance, including exact dates and times:

The period of non-compliance is suspected to be January 5th through January 7th. Heat Pump #1 had not been running for some time but was switched online during that time. The assumption of Heat Pump 1 being the source of the leak is due to a designation of non-detect (ND) on the sample taken 11 January while Heat Pump #2 was running.

3. Estimated time noncompliance is expected to continue if it has not been corrected:

Heat Pump #1 will remain out of service until further testing can be performed.

4. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance:

The heat pump has been taken out of service and is being evaluated for possible leaks.

5. BMP corrective actions taken:

The Heat Pump was taken out of service per BMP corrective actions to prevent any further discharge to the environment. Additional sample will be taken and sent for sampling to ensure that the Heat Pump is not leaking oil before it is returned to service.

6. Recommended changes to operation and maintenance practices and procedures to prevent incident recurrence:

No recommendations at this point.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

STEGALL.JUSTIN, Digitally signed by
STEGALL.JUSTIN.RAY.1363910650
RAY.1363910650 Date: 2023.02.13 16:43:35 -08'00'

JUSTIN R. STEGALL
Operations Project Manager
Little Goose Lock and Dam